



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

August 3, 2009

Chief, Rulemaking, Directives, and Editing Branch
U.S. NRC
Mail Stop T6-D59
Washington, D.C. 20555-0001

RE: Final Generic Environmental Impact Statement for License Renewal of Nuclear Plants
Supplement 37 Regarding Three Mile Island Nuclear Station, Unit 1 June 2009 CEQ #20090218

Dear Sir:

The U.S. Environmental Protection Agency (EPA), Region 3, reviewed the Final Environmental Impact Statement (FEIS) for the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The FEIS was prepared in order to assess the potential impact related to the license renewal for the Three Mile Island Nuclear Station, Unit 1 (TMI-1) for an additional 20-year period.

During the extended license period, the facility owners or operators may be required to undertake refurbishment activities, or, for economic or safety reasons, may choose to perform such activities. Replacement of the pressurized-water reactor steam generators, among other things, is included as part of the refurbishment activities. Exelon Generation Company, LLC (the facility owner/operator) plans to replace the two generators at the facility with new, once-through, enhanced steam generators. According to the Draft Generic Environmental Impact Statement, the transportation process associated with these two generators may include dredge and fill activities, temporary or permanent removal of route interferences (such as narrow tunnels, and low-hanging overhead wires), temporary redirecting of streams, cofferdams, and weight-bearing modification to bridges. Based on the limited information included regarding impacts related to the generator transportation process, EPA rated the Draft Environmental Impact Statement (DEIS) as and EC-2 (Environmental Concerns, and adequacy of the impact statement as 2 – Insufficient Information). A description of our rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

While the FEIS provides, among other things, additional details on bridge modifications and possible by-passes over the Pequea, Chiques, Conowingo and Conoy Creeks, it continues to be deficient in presenting the environment impacts associated with these construction activities.

EPA recommends that the NRC continue to work with the project sponsor, as well as appropriate state and federal agencies, to identify and quantify these impacts. Every effort shall be made to avoid, minimize and mitigate these impacts.

In an effort to minimize construction emissions EPA is recommending the following typical Best Management Practice (BMPs).

- Utilize appropriate dust suppression methods during on-site construction activities. Available methods include application of water, soil stabilizers, or vegetation; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-movement activities during high wind conditions;
- Maintain a speed of less than 15 mph with construction equipment on unpaved surfaces as well as utilize fuel with lower sulfur content;
- Employ a construction management plan in order to minimize interference with regular motor vehicle traffic;
- Use electricity from power poles instead of generators whenever possible;
- Repair and service construction equipment according to the regular maintenance schedule recommended for each individual equipment type;
- Incorporate energy-efficient supplies whenever feasible.

Thank you for the opportunity to offer these comments. If you have any questions, please contact me at (215) 814-5724.

Sincerely,

A handwritten signature in black ink, appearing to read 'K Magerr', written in a cursive style.

Kevin Magerr
Environmental Engineer